June 18, 2020

The Honorable Jesse M. Furman Thurgood Marshall U.S. Courthouse U.S. District Court for the Southern District of New York 40 Centre Street, Room 2202 New York, NY 10007

RE: Motion for Extension of Time State of New York, et al. v. U.S. Dep't of Commerce, et al., 18-CV-2921 (JMF)

Dear Judge Furman:

On May 21, 2020, the Court issued an Opinion and Order (Doc. 694). The NGO Plaintiffs and Defendants conferred per the Court's Order. The parties have reached an agreement in principal as to a payment for the fees and costs per the Court's Order, subject to the Defendants getting final approvals and finalizing an agreement.

The Court ordered that Plaintiffs file a supplemental application within 30 days. Given that the parties have an agreement in principal but still need time to finalize the details, Plaintiffs request an eight (8) day extension for this filing. Plaintiffs request that they have until June 29, 2020 to file a supplement application, if needed. In the event the settlement is finalized before that time, Plaintiffs will notify the Court.

Respectfully submitted,

AMERICAN CIVIL LIBERTIES UNION ARNOLD & PORTER KAYE SCHOLER LLP

By: <u>/s/ Dale E. Ho</u>

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49(c)(3).

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